

**REMARKS BY SUSAN P. BODINE**  
**AIR AND WASTE MANAGEMENT ASSOCIATION RCRA CONFERENCE**  
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**This is my first public speech as the new Assistant Administrator for the Office of Solid Waste and Emergency Response. Whenever someone new takes over a position like mine, it's common practice for people who work on the issues, whether inside EPA or out, to wonder what will change. What priorities from the past few years will be quietly shelved? What new initiatives will the new person bring to the table?**

**If you came here looking for answers to those questions, I'm afraid you'll be disappointed. While I've been working on environmental issues for the past 17 years, I don't presume to know the merits of everything going on in the Office of Solid Waste, much less everything going on in OSWER. So, what I'm doing right now is listening. As I hope all of you will learn, I'm a good listener.**

**Before jumping to any conclusions about an EPA program or activity, I want to hear what problem is being tackled. I want to hear about the technical issues involved. I want to hear from people on all sides – both those who agree and those who disagree.**

**When I was a practicing attorney back in the late 1980s and early 1990s, listening helped me solve problems. During the 11 years I spent on the Hill as a counsel and Staff Director to the Water Resources and Environment Subcommittee, listening was a critical part of the legislative process, and it resulted in better decisions and better laws. In my new position as AA of OSWER, I will continue to listen to everyone who is involved in an issue – EPA staff, state governments, NGOs, and the business community.**

**Today, however, I have to do the talking, since you have invited me to speak. So, I thought I'd share with you my perspective on the programs managed by the Office of**

**Solid Waste, and in particular the Resource Conservation Challenge. What you are going to hear is not so much an agenda as an approach -- an approach that I intend to apply during my time at EPA.**

**For the last few years, the Resource Conservation Challenge has been one of the leading initiatives in EPA's Office of Solid Waste. Many private sector companies have been engaged as energetic partners. So where do I intend to take the RCC during my time at EPA?**

**I answer questions like that in the context of three principles. First, I believe government programs, like government offices, justify their existence only if they work. That is, they have to be focused on a specific outcome. They have to produce results. Second, those results have to be verifiable and quantifiable in ways the public can understand. Third, if an idea or program really works, then we should apply it across the board, and if it doesn't work we should throw it out. If we come across an idea that's a better way of doing things, we should use it everywhere we can.**

**When I first arrived in my new office, I wasn't quite sure what to make of the RCC. Frankly, I was somewhat skeptical. On the one hand, it sometimes was described as a separate, distinct program; a box with a finite but changeable set of parts – electronics, municipal solid waste, coal ash, etc. On the organizational chart, OSW was here, and underneath it were several elements, one of which was the RCC.**

**On the other hand, the RCC sometimes sounded less like a distinct program and more like a way of thinking, a philosophy of action. RCC meant a commitment to the efficient use of input materials, including energy. It meant the reuse of materials everywhere it made sense environmentally and economically. It meant designing products and manufacturing processes so less waste was produced, and the waste was less toxic.**

As I listened to different descriptions of the RCC, it seemed to be governed by the laws of quantum mechanics. Sometimes it was a particle, and sometimes it was a wave, and sometimes it was both at the same time, depending on who was talking about it.

After listening to these different descriptions and then hearing about the results achieved by the RCC, I have come to the conclusion that RCC cannot be a separate box over in OSW. The ideas underlying the RCC make sense environmentally and economically. Of course, you already know this. You've been hearing that from Marianne Horinko and Tom Dunne for years. But I am the newcomer. I had to listen and be persuaded – and I am.

At a time when historically high energy and raw material prices pose a threat to our economy and our national security, we would be irresponsible not to look for every possible opportunity to use input materials, including energy, as efficiently as possible. This is especially true at EPA, where we understand very well the environmental benefits of material efficiency.

So, in practical terms, what does my point of view on the RCC mean for OSW's employees, and for the professionals in the private sector, state governments, and nongovernmental organizations who are our partners? It means I'm going to be looking for opportunities to improve materials efficiency and reduce the amount and toxicity of waste in all of OSW's programs and partnerships. It also means we will continue with the ongoing RCC efforts in what I've called the RCC box. These programs have accomplished a great deal, particularly in the electronics and coal combustion industries, where real, significant, measurable amounts of material have been recycled and reused.

In fact, in my mind the most impressive aspect of these voluntary partnerships is how much can be accomplished with so few government resources. The key, of course, is leverage. The real work, the heavy lifting, is done by our partners. At EPA we understand that, and we appreciate it.

**It means that as long as I'm in this job, EPA will continue to be a willing, committed partner with people interested in finding new and better ways of managing their material flows. If we can add credibility to these wide efforts, we will. EPA is a working partner in the GreenScapes Alliance, the Sustainable Packaging Coalition, the Coal Combustion Products Partnership, and the Plug-In to e-Cycling Partners, all of which bring private businesses together to tackle common problems.**

**We will continue doing that. If we can help test and ensure the environmental safety of reused or recycled products, we will. If we can bring participating companies and communities some public recognition for their hard work and accomplishments, we will. And if we can find incentives for broader participation, incentives like paperwork burden reductions and streamlined permit modifications, we will.**

**My appreciation of the merits of the Resource Conservation Challenge also means that we will apply RCC principles to our regulatory programs as well. Writing, implementing, and enforcing regulations is still a big part of OSW's business, and it will continue to be for the foreseeable future. Obviously, legal requirements, particularly RCRA, drive our actions. But even in its regulatory programs, EPA can do a lot to encourage behavior that applies the principles of the RCC while carrying out the requirements of RCRA. After all, RCRA stands for the Resource Conservation and Recovery Act.**

**I realize OSW is already building RCC ideas into RCRA regulations. We're attempting to revise hazardous waste regulations so companies are encouraged to recycle their wastes instead of burying or burning them. We're working on regulations that will permit the safe recovery and recycling of the metals left over after electroplating. We're examining safe ways to use secondary materials as a fuel when the risks posed by the management and combustion of these fuels are equal to or less than the risks posed by burning conventional fuels.**

**Putting these rules into practice isn't going to be easy. Some of the examples I just mentioned have been debated for years. Sometimes the environmental community doesn't like the proposals, and sometimes industry doesn't like the proposals. Objections will always be raised when we propose regulatory changes. But if we agree on the goal of resource conservation, and apply that principle, we have a good chance of finding common ground.**

**I want to leave you with two main thoughts regarding the RCC. First, during my time at EPA I'm going to fight for rules that spur, or remove barriers to, better materials management in this country. After listening to all sides, we may have to alter our proposals. We may have to compromise on some points to move the rules through the process. But by focusing on the outcome of resource conservation, we should be able to agree on regulatory changes that will make a big difference in our environmental and economic future.**

**Second, I'm going to ask that the OSW staff keep their eyes open for other opportunities where regulatory changes or new voluntary initiatives could give a boost to better materials management. I want OSW to be known as a place where better materials management practices are actively encouraged and supported in everything we do, whether regulatory or voluntary.**

**I appreciate the fact that you've listened to me today. As I said at the outset, for my part, I fully intend to listen very hard to all of you as we work together to protect human health and the environment.**

**Thank you very much.**